

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIN GUILLORY,

Defendant.

NO. CR24-178RSM

**PROTECTIVE ORDER**

Upon unopposed motion of the United States, and for good cause shown, the Court ORDERS as follows pursuant Federal Rule of Criminal Procedure 16(d)(1):

1. Some of the material to be produced in discovery in this matter includes personal identifying and financial information (PII), which is defined for purposes of this Order as Social Security numbers, driver's license numbers, dates of birth, home addresses, mothers' maiden names, passwords, debit card and credit card account numbers, salary or other personal financial information, bank account numbers, and personal identification numbers. The government will label material containing PII with the marking "Protected PII Subject to Protective Order."

2. Access to discovery material containing PII will be restricted to the Defense Team, with the limited exceptions discussed in paragraph 3, below. "Defense

1 Team” shall be limited to attorneys of record for the defendant and any of the following  
2 people working on this matter under the supervision of the attorneys of record: attorneys,  
3 investigators, paralegals, law clerks, testifying and consulting experts, and legal  
4 assistants. For purposes of this Order, “Defense Team” does not include the defendant.  
5 Defendant’s attorneys shall inform any member of the Defense Team to whom disclosure  
6 of discovery material containing PII is made of the existence and terms of this Protective  
7 Order, and will provide material only to persons who have agreed to the terms of this  
8 Protective Order. Members of the Defense Team shall not provide copies of any  
9 discovery material containing PII to any persons outside of the Defense Team, except as  
10 specifically set forth below. Members of the Defense Team will only use the discovery  
11 materials for the purpose of preparing a defense to this prosecution.

12 3. Defense counsel may provide discovery to the defendant for review in  
13 accordance with Bureau of Prisons discovery procedures, subject to the following  
14 conditions:

- 15 a) Defendant shall not use any discovery material, including material  
16 containing PII for any purpose other than the defense of this prosecution;
- 17 b) Defendant will maintain only a single copy of discovery containing PII,  
18 which shall not be duplicated. Defendant shall not provide copies of the  
19 discovery material containing PII to any third parties and may only review  
20 the discovery material containing PII either alone or in the presence of the  
21 Defense Team; and
- 22 c) Within 30 days of the entry of any final judgment in this case, the  
23 defendant shall destroy or return to defense counsel all discovery material  
24 containing PII.

25 4. Any discovery material containing PII that the Defense Team files on the  
26 Court’s public docket shall be filed consistent with Local Criminal Rule 49.1.

27 5. Nothing in this Order should be construed as imposing any discovery  
obligations on the government or the defendants that are different from those imposed by

1 case law, Rules 16 of the Federal Rules of Criminal Procedure, the Due Process  
2 Protection Act (DPPA) and the Local Criminal Rules.

3 6. This Order may be modified, as necessary, by filing with the Court a  
4 Stipulated Order Modifying the Protective Order, or by order of the Court. In the event  
5 compliance with this Order makes it difficult for defense counsel to adhere to their Sixth  
6 Amendment obligations, defense counsel shall bring any concerns about the terms of the  
7 Order to the attention of the government. The parties shall then meet and confer with the  
8 intention of finding a mutually acceptable solution. In the event that the parties cannot  
9 reach such a solution, defense counsel shall bring any concerns about the scope or terms  
10 of the Order to the attention of the Court.

11 DATED this 14<sup>th</sup> day of November, 2024.

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14 RICARDO S. MARTINEZ  
15 UNITED STATES DISTRICT JUDGE  
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17 Presented by:

18  
19 s/ Seth Wilkinson  
20 SETH WILKINSON  
21 Assistant United States Attorney  
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